

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)
)
 v.)
)
TANNER JACKSON,)
)
 Defendant.)
_____)

Criminal No. 1:21-CR-00238 LMB

RESPONSE TO THE GOVERNMENT’S SENTENCING POSITION

Defendant Tanner Jackson submits this brief response to the U.S. Attorney’s sentencing position, most of which responds to the government’s position concerning the \$184,000 contract that is the subject of the plea agreement.

RELEVANCE OF THIS RESPONSE

This response addresses these subject products as they support the Defendant’s position that Defendant Jackson did not knowingly place defective products into the supply of government products. Additionally, these documents support the position that these products did not place anyone at a risk of death or serious bodily injury, concerning the potential enhancement in the PSR.

The Defendant would show the Court the following:

I. SUBJECT HELMETS PASSED TESTING

The subject helmets and body armor plates of the contract did pass testing that not only met the standards but exceeded them due to the number of tests that were conducted, as well as the intensity of the testing.

Attached are documents to support this contention, which are:

1. NTS Testing Report – Armor
2. NTS Testing Report – Helmets
3. NIJ Standards – Helmets
4. Email 2019 - Plates Passed
5. Email 7-18-19 – Testing Incorrect
6. Tests – With Inaccuracies

II. OTHER

Documents to address the other contracts listed in the PSR as relevant conduct are included, which are:

7. Email re CLIN (\$124,000 contract)
8. Xinxing Email re 550 kg

Dated: March 18, 2022

Respectfully submitted,

/s/ Benjamin North
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CERTIFICATE OF SERVICE

I certify that on March 18, 2022, a copy of the foregoing Response to the Government's Sentencing Position was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record.

/s/ Benjamin North
Benjamin North, VSB# 97439